

TITLE V PERMIT STATEMENT

Significant Modification to Title V Permit

Facility Name:	Saturn Corporation
City:	Spring Hill
County:	Maury

Date Application Received:	June 2, 2005
Date Application Deemed Complete:	August 1, 2005

Emission Source Reference No.:	60 - 0132
Permit No.:	548092

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-3-9-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Saturn Corporation** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms:

PSD	Prevention of Significant Deterioration
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
MACT	Maximum Achievable Control Technology
NSR	New Source Review

I. Identification Information.

A. Source Description. Saturn Corporation facility in Spring Hill Tennessee manufactures automotive vehicles. The facility includes three Business Units: Powertrain, Body Systems, and Vehicle Systems. The Powertrain Business Unit includes an iron foundry, an aluminum foundry, various heat treatment processes, several automated machining lines, and an engine assembly line. The Body Systems Business Unit includes injection molding operations, sheet metal stamping operations, space frame and component fabrication, and painting operations. The Vehicle Systems Business Unit includes injection molding, cockpit assembly, and vehicle assembly operations.

ESRN NO.	EMISSION SOURCE DESCRIPTION	BUSINESS UNIT
12	Pattern Making for Lost Foam Casting	Powertrain
13	Iron Melting	Powertrain
14/26	Aluminum Melter/Holder Furnaces, Melting, Holding, and Pouring	Powertrain
18	Iron Casting Finishing and Shot Blasting	Powertrain
19	Aluminum Die Casting	Powertrain
20	Aluminum Lost Foam Sand System	Powertrain
21	Iron Lost Foam Sand System and Pouring	Powertrain
22	Sand Storage Silos	Powertrain
24	Aluminum Head and Block Mold Shakeout	Powertrain
25	Iron Mold Shakeout	Powertrain
28	Lost Foam Heat Treating	Powertrain
30	Parts Cleaning	Powertrain
31	Heat Treat Shot Peening	Powertrain
51	Aluminum Head and Block Mold Cooling	Powertrain
52	Iron Mold Cooling	Powertrain
53	Aluminum Head and Block Line Plastic Shot Blasting	Powertrain
54	Maintenance and Tool Room Welding, Steam Cleaning Booth	Powertrain
55	Engine & Transmission Machining	Powertrain
57	Endo Gas Generators for Heat-Treating Gears & Shafts	Powertrain
58	10 Ten Heat Treat/Oil Quench Furnaces for Gears & Shafts	Powertrain
60	On-Line Robotic RTV Application	Powertrain
64	Maintenance Grinding	Powertrain
99	(2) Natural Gas Fired Boilers	Powertrain
11	New Powertrain Machining Line	Powertrain
03	New Engine Assembly Line	Powertrain
06	Body Fabrication	Body Systems
32	Space Frame and Sheet Metal E-Coat System	Body Systems
33	Major Panel Topcoat Operations	Body Systems
36	Major Panel Prime System	Body Systems
37/39	Fascia/ Reprocess Topcoat (Basecoat & Clearcoat)	Body Systems
67/38	Fascia/ Service Parts Prime	Body Systems
35/40	Space Frame Underbody PVC/Seam Seal Application/Blackout	Body Systems
41	Miscellaneous Operations	Body Systems
65	Fascia Adhesion Promoter Spray Booth	Body Systems
98	Hot Water Heaters	Body Systems
08	Panel Coat (Adhesive)	Vehicle Systems
09	Instrument Panel Foaming	Vehicle Systems
45	Etch/Prime Black Glass Application	Vehicle Systems
49	Car Start, Roll Test, Toe-Set and Repair Operations	Vehicle Systems
50	Combined Final Assembly Repair	Vehicle Systems
66	Door Seal Adhesive Operation	Vehicle Systems
10	New Final Assembly Line	Vehicle Systems
01	Site-Wide Products of Combustion	N/A

B. Facility Classification.

1. Area is designated as an attainment area for all pollutants.
2. Company is located in a Class II area. (Primarily, this means that the facility is not located within a national park or national wilderness area; refer to 40 CFR 52.21(e) for complete definition) Company *is not* located within 50 miles of a *Class I area*.

C. Regulatory Status.

1. **PSD/NSR.** This facility *is* a major source under PSD.
2. **Title V Major Source Status by Pollutant.**

Pollutant	Is the pollutant emitted?	If emitted, what is the source's status with respect to the Title V Program? (Major/Minor)
PM	YES	Minor
PM ₁₀	YES	Minor
SO ₂	YES	Minor
VOC	YES	Major
NO _x	YES	Minor
CO	YES	Minor
Individual HAP	YES	Major
Total HAPs	YES	Major

3. MACT Standards.

This source *is* major for HAPs and *is* subject to the following NESHAP (MACT Standard).

40 CFR Part 63, Subpart IIII – National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks

40 CFR Part 63, Subpart DDDDD – National Emissions Standards for Boilers and Process heaters

4. Program Applicability.

Are the following programs applicable to the facility?

PSD (*yes*)

NESHAP (*yes*)

NSPS (*yes*)

II. Compliance Information.

- A. Compliance Status.** Is the source currently in compliance with all applicable requirements? (*yes*)
Are there any applicable requirements that will become effective during the permit term? (*yes*)

This facility must comply with 40 CFR Part 63, Subpart IIII – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks by April 26, 2007.

III. Other Requirements.

- A. Emissions Trading.** The source is not involved in an emission trading program.
- B. Acid Rain Requirements.** This source is not subject to any requirements in Title IV of the Clean Air Act.
- C. Prevention of Accidental Releases.** The source shall submit the compliance certification to the Technical Secretary by January 31 of each year.
- D. Plantwide Applicability Limits (PAL).** The source received the original permit under the special PAL provisions, which allows sets plantwide emission limits while allowing more flexibility in modifying the source.

IV. Public Participation Procedures.

A. Notification of this draft permit was mailed to the following environmental agencies:

1. U.S. EPA, Region IV
2. Alabama, DEM
3. Nashville Metropolitan Health Dept.

Significant Modification

The significant modification does not include any emissions unit modification.

The proposed changes include:

- Incorporation of new applicable requirements;
- Removal of permit conditions that have been met and have no recurring compliance requirement;
- Revisions to the pre-approved New Source Review (NSR) provisions;
- Revisions to the compliance testing protocols;
- Revisions to the list of non-applicable requirements; and
- Minor permit language text revisions and corrections to provide clarification.

Issued on _____